

Appl. No.: 09/541,141  
Amdt. dated: February 9, 2004  
Reply dated: August 4, 2004

### REMARKS/ARGUMENTS

The Examiner rejected claims 1-6, 8, 20-25, and 27 as being anticipated by Lee, U.S. Patent No. 6,226,050 B1.

Lee discloses an image processing technique that involves using a gradient operation unit 110 and a binary edge map generator 120. In all cases, Lee teaches that the filtering axis is parallel to both the horizontal and vertical orientations of the image.

Claim 1 patentably distinguishes over Lee by claiming that the image edge and the filtering axis are not parallel to the horizontal and not parallel to the vertical orientation of said image. Lee fails to suggest any advantage of the claimed orientation nor any motivation to change to include the claimed orientation.

Claims 2-8 depend from claim 1, either directly or indirectly, and are patentable for the same reason asserted for claim 1.

The Examiner rejected claims 20-26 and 27 as being unpatentable over Lee.

The present inventors came to the realization that the two interlaced fields often undergo different operations during compression and it is advantageous to apply post-processing separately to the images represented by the individual fields. Applying post-

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processing separately to the fields avoids the complication of block classification and confusing an intensity change between fields as an image edge. Identifying an intensity change between fields as an image edge is a particular problem at the boundaries of moving objects.

The Examiner properly takes official notice that interlaced fields are well known in the art. The Examiner then apparently suggests that Lee would obviously filter based upon the interlaced fields, as opposed to the non-interlaced fields. Accordingly, the Examiner seemingly suggests that Lee would apply its filter to  $\frac{1}{2}$  of the image (the first field) and then apply its filter to the other  $\frac{1}{2}$  of the image (the second field).

The applicant respectfully notes that Lee teaches the application of its filter to the "image", which is the entire image. There is no suggestion in Lee to apply its filter to the interlaced fields of an image. Further, without the present inventor's realization above, there would be no motivation to increase the computational complexity of the system in order to filter based upon the interlaced fields.

Claim 20 patentably distinguishes over Lee for the reasons asserted above.

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Claims 21-27 depend from claim 20, either directly or indirectly, and are patentable for the same reasons asserted for claim 20.

The Examiner indicated that claims 9-19 are allowable.

The applicant respectfully requests that a timely notice of allowance be issued in this case. If the Examiner believes that for any reason direct contact with applicant's attorney would advance the prosecution of this application, the Examiner is invited to telephone the undersigned at the number below.

Respectfully submitted,  
Chernoff, Vilhauer, McClung & Stenzel, LLP  
1600 ODS Tower  
601 SW Second Avenue  
Portland, Oregon 97204

By: 

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Kevin L. Russell  
Pat. Reg. No. 38,292  
Tele No. (503) 227-5631  
FAX No. (503) 228-4373